

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

JOHN SCHRAGE,)
vs. Plaintiff,)
vs.)
HRISTOS V. KALTSAS,)
Defendant.)

)

) Civil Action No.: 2:24-cv-4382-RMG
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PLAINTIFF'S RESPONSES TO LOCAL
RULE 26.01 INTERROGATORIES
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Plaintiff John Schrage responds to Local Rule 26.01's interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: Conduent Payment Integrity Solutions o/b/o CIGNA Health Insurance may have a subrogation interest to the extent any health insurance payments were made for Plaintiff Schrage's medical bills. Conduent's address is P.O. Box 30114, Salt Lake City, UT 84130-9993, and their phone number is (801) 562-6544.

(B) As to each claim state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff and Defendant have both requested jury trials on all claims.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Plaintiff Schrage is an individual, not a corporation.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division.

RESPONSE: Plaintiff does not challenge the appropriateness of the division.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

RESPONSE: Plaintiff is not aware of any other related action.

(F) & (G) omitted, as they apply to Defendants only.

(H) *Parties or Intervenors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

RESPONSE: Plaintiff is a citizen and resident of South Carolina.

MORGAN & MORGAN

s/Jonathan D. Graham
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ATTORNEYS FOR PLAINTIFF

December 18, 2024
Charleston, SC